

UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

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KIDANEMARIAM KASSA,	)	
	)	
<b>Plaintiff,</b>	)	<b>CIVIL ACTION FILE NO.</b>
vs.	)	<b>1:17-CV-02068-AT</b>
FULTON COUNTY, GEORGIA,	)	
PAUL H. HOWARD, officially &	)	
individually,	)	
ANTIONETTE STEPHENSON,	)	
individually,	)	<b>JURY TRIAL REQUESTED</b>
PIERRE EASLEY, individually, and	)	
JOHN DOE, officially & individually,	)	
	)	
<b>Defendants.</b>	)	
	)	

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**PLAINTIFF'S RESPONSE TO DEFENDANT FULTON COUNTY'S  
SPECIAL APPEARANCE MOTION TO DISMISS PURSUANT TO  
FED.R.CIV.P. 12(b) (2), 12 (b) (5) AND (12 (b) (6))**

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COMES NOW PLAINTIFF KIDADEMARIAM KASSA ("Plaintiff") and by and through his undersigned counsel of record and files this RESPONSE TO DEFENDANT FULTON COUNTY'S SPECIAL APPEARANCE MOTION TO DISMISS PURSUANT TO FED.R.CIV.P. 12(b) (2), 12 (b) (5) AND (12 (b) (6)).

Plaintiff respectfully requests that this Honorable Court DENY Defendant Fulton County's Motion, FIND that service of process on Defendant was sufficient and that other claims of Defendant are moot due to the filing of Plaintiff's First Amended Complaint for Damages after the filing of Defendant's motion.

Respectfully submitted this 27<sup>th</sup> day of October, 2017.

**/S/ TIFFANY WILLIAMS ROBERTS**

**Tiffany Williams Roberts**

Bar No. 791208

235 Peachtree Street, Suite 400

Atlanta, Georgia 30303

(404) 287-2090 – telephone

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[troborts@tiffanywroberts.com](mailto:troborts@tiffanywroberts.com)

**CERTIFICATION**

Counsel for Plaintiff certifies that the foregoing Complaint complies with the font and point size requirements of Local Rule 5.1 (C).

**/S/ TIFFANY WILLIAMS ROBERTS**

**Tiffany Williams Roberts**

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<b>PAUL H. HOWARD, officially &amp;</b>	)	
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<b>ANTIONETTE STEPHENSON,</b>	)	
<b>individually,</b>	)	<b>JURY TRIAL REQUESTED</b>
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<b>JOHN DOE, officially &amp; individually,</b>	)	
	)	
<b>Defendants.</b>	)	
	)	
	)	

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**CERTIFICATE OF SERVICE**

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I HEREBY CERTIFY that on October 27, 2017, I have electronically filed the foregoing PLAINTIFF'S RESPONSE TO DEFENDANT FULTON COUNTY'S SPECIAL APPEARANCE MOTION TO DISMISS & BRIEF IN SUPPORT with the Clerk of Court using the CM/ECF system which will provide electronic notification to the following attorney of record:

Ashley J. Palmer  
OFFICE OF THE FULTON COUNTY ATTORNEY  
141 Pryor Street, S.W., Suite 4038  
Atlanta, Georgia 30303  
(404) 612-0246 (office); (404) 730-6324 (facsimile)

This the 27<sup>th</sup> day of October, 2017.

**/S/ TIFFANY WILLIAMS ROBERTS**

**Tiffany Williams Roberts**

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